



The Honorable David Garman, Assistant Secretary
Office of Energy Efficiency & Renewable Energy
U. S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

March 27, 2003

Re: ENERGY STAR Windows Criteria Proposed Changes

Dear Mr. Garman:

I am the owner of Scungio & Company, a construction management and consulting business who provides consulting services to ATOFINA Chemicals, a major player in the pyrolytic Low-E glass coating market. I have a great concern that the DOE's February 11, 2003 announcement to consider the adoption of the 3-zone alternative not only risks the loss of jobs for employees and small businesses but fails to incorporate the best method to maximize overall energy savings in the United States. Adoption of the 3-zone alternative will eliminate pyrolytic Low-E glass from the US market and create an unfair and uncompetitive business environment by creating a monopoly for the competing technology. Adoption of the 4-zone alternative will provide the best overall energy plan and the fairest business environment for legitimate Low-E technologies.

I oppose the 3-zone proposal and support the 4-zone proposal for the following reasons:

- The 3-zone proposal will create a monopoly in the marketplace by eliminating the use of pyrolytic Low-E glass. The elimination of this technology will reduce consumer choice on energy efficient products and eliminate the benefit of lowering home heating costs. Further, loss of jobs will be certain.
- The 4-zone proposal saves more energy than the 3-zone proposal as evidenced by your own supporting documentation and research.
- The 3-zone proposal is the same proposal your agency withdrew last year after numerous objections were raised by members of Congress and industry members. Conversely, the map of the 4-zone proposal outlines the substantial climate analysis conducted by the DOE and puts that understanding into practice.

In closing, I believe that the ENERGY STAR Windows program must recognize the overall energy efficiency of pyrolytic Low-E glass. On this basis, DOE's proposed 4-zone alternative is the only viable choice and must be adopted. DOE's 3-zone alternative must not be adopted. Adopting the 4-zone alternative provides greater overall energy savings, preserves existing jobs and encourages a competitive marketplace that will drive Low-E technology into the future.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott P. Scungio". The signature is fluid and cursive, with the last name "Scungio" being more prominent.

Scott P. Scungio
Principle

Cc: Congressman Kurt Weldon
Senator Rick Santorum
Senator Arlen Specter
Charles A. Kitchen, ATOFINA Government Relations

Scungio & Company, LLC

101 West Rose Tree Road Media, Pennsylvania 19063
Phone: 610-627-0800 | Fax: 208-979-3567 | contact@scungio.com